

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

KIMBERLY HARSMAN, <i>et al.</i>,	:	
	:	
Plaintiffs,	:	Case No. 1:21-cv-00597
	:	Judge Timothy S. Black
	:	
v.	:	
	:	
	:	DECLARATION OF ELLEN BECKETT
	:	
CINCINNATI CHILDREN'S	:	
HOSPITAL MEDICAL CENTER, <i>et al.</i>,	:	
	:	
Defendants.	:	

Comes now the Declarant, Ellen Beckett, and having been first duly cautioned, declares as follows:

1. My name is Ellen Beckett. I am over the age of 18.
2. I am employed at TriHealth, Inc. My title is Director of Human Resources, Business Partner Operations. Based upon my work in this position and documents and information maintained in the ordinary course of TriHealth, Inc.'s business, I have firsthand knowledge of the facts stated herein.
3. TriHealth, Inc. is an Ohio non-profit corporation. TriHealth and its related companies, like TriHealth G, LLC d/b/a TriHealth Physician Partners, Good Samaritan Hospital of Cincinnati, Ohio and Bethesda Hospital, Inc. (referred to together as "TriHealth"), employ approximately 12,000 doctors, nurses, and other healthcare providers and support staff.
4. The Plaintiff, Andrea Velez, is currently an employee of Good Samaritan Hospital of Cincinnati.

5. As part of my duties, I am familiar with the implementation of TriHealth's COVID-19 employee vaccination requirement.

6. The COVID-19 vaccination requirement requires all TriHealth non-leader employees (except those granted a religious or medical exemption or on a deferment due to pregnancy) to have become fully vaccinated against COVID-19 by October 31, 2021. All TriHealth employees in a leadership position had to be vaccinated by September 21, 2021 (or granted a religious or medical exemption or on a deferment due to pregnancy by that date).

7. TriHealth's COVID-19 vaccine requirement allows for all employees to request exemptions for medical reasons and sincerely held religious beliefs. The requirement also allows for deferments due to pregnancy. These requests are evaluated on a case-by-case basis.

8. If an employee does not get fully vaccinated against COVID-19 by the applicable deadline (or receive an exemption or deferment under the circumstances discussed above), the following occurs: Employees in non-leadership roles are put on eight weeks unpaid administrative leave and if those employees are not fully vaccinated by the end of that period, they are deemed to have resigned. Employees in leadership roles are treated the same way – except that they only have four weeks (instead of eight) to comply.

9. Velez requested and received an exemption from TriHealth's vaccine requirement on the basis of a sincerely held religious belief. Her exemption was approved on September 22, 2021, and she was informed of her qualification for the exemption that same day.

Pursuant to 28 U.S.C. §1746, I, Ellen Beckett, declare under penalty of perjury that the foregoing is true and correct.


Ellen Beckett